



## Minnesota Housing eNews Alert

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### Environmental Protection Agency (EPA) Renovation, Repair and Painting Rule

On April 22, 2010, the new lead-based paint rule released by the federal EPA called the Renovation, Repair and Painting (RRP) Rule takes effect. RRP Rule applies to all organizations and individuals undertaking a compensated renovation to housing built before 1978. [Get more information on the RRP Rule.](#)

The RRP Rule institutes lead safe work practices across the entire rehabilitation industry. Lead safe work practices have always been required as part of the Lead Safe Housing Rule. For all Minnesota Housing funded activities, HUD's Lead Safe Housing Rule (24 CFR Part 35) applies:

- For federally funded activities (including the Rehabilitation Loan Program), the [Lead Safe Housing Rule](#) applies in its entirety; and
- For state funded activities (including the Community Revitalization Program and Emergency Loan Program), the modified Lead Safe Housing Rule applies and is outlined in Minnesota Housing's [Lead Based Paint Guidebook For Applicable Homes Division Programs](#).

[View a summary on the differences between Lead Safe Housing Rule and RRP.](#)

Since Minnesota Housing rehabilitation activities must comply with **both** the Lead Safe Housing and the RRP Rule, there are additional requirements related to:

1. Training for rehabilitation contractors; and
2. Providing pamphlets to homeowners.

### Training Requirements for Rehabilitation Contractors

All rehabilitation contractors must be:

- Certified by EPA as a Renovation Firm (Re-certification is required every 5 years); and
- Have at least one individual at the Renovation Firm trained as a Certified Renovator. Attendance at an EPA-RRP accredited initial renovator training course (eight-hours) is required. The EPA-RRP four-hour Refresher course is required every 5 years to maintain certification as a Certified Renovator.

A Certified Renovator is responsible for

- Conducting set-up for rehabilitation activities;
- Ensuring rehabilitation is performed in accordance with lead safe work practices;
- Verifying proper cleanup, and;
- Training non-certified on-the-job workers in lead safe work practices.

All workers *do not need certification* if on-the-job training is received from a Certified Renovator and the work is not regulated by the Lead Safe Housing Rule.

**When work is regulated by the Lead Safe Housing Rule, such as the Rehabilitation Loan Program, all workers and supervisors must complete a HUD-approved curriculum in lead safe work practices, except that non-certified workers need only on-the-job training if they are supervised by a lead-based paint abatement supervisor who is also a Certified Renovator.**

Training previously received to meet the Lead Safe Housing Rule is not sufficient to meet RRP requirements. Those trainings include:

- Abatement worker or supervisor course accredited by EPA, or an EPA-authorized State or Tribal program;
- Joint EPA-HUD Lead Safety for Remodeling, Repair and Painting, 2003 (EPA 747-B-03-001);
- EPA Model Training Course Minimizing Lead-Based Paint Hazards During Renovation, Remodeling, and Painting, 2000 (EPA 747-B-00-005);
- HUD Addressing Lead-Based Paint Hazards During Renovation, Remodeling and Rehabilitation in Federally Owned and Assisted Housing Course, and;
- HUD Lead-Based Paint Training for Remodelers and Renovators Course

Rehabilitation contractors who have taken these courses are allowed to take the four-hour EPA-RRP Refresher course to meet RRP requirements.

[View information on how rehabilitation contractors can become a Certified Firm or a trained Certified Renovator.](#)

Minnesota's Department of Labor and Industry also provides a listing of [Certified Renovator courses](#) on their Contractor Licensing Continuing Education website.

In addition, [Minnesota's Department of Health](#) provides a listing of these courses and other lead safe training courses including lead inspector, lead risk assessor, lead abatement supervisor and lead worker training.

## **Pamphlet Provision**

RRP requires the rehabilitation contractor to provide the occupants of the target housing a copy of the pamphlet, [Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools](#) (Renovate Right).

Minnesota Housing funding recipients also need to provide the Renovate Right pamphlet to housing owners and tenants before the work begins in order to meet the requirements of the Lead Safe Housing Rule. **It should be noted that several items in the Renovate Right**

pamphlet need to be clarified with homeowners when following the Lead Safe Housing Rule:

1. They **do not** have the option of using a lead test kit from a hardware store as suggested on page five of the pamphlet. They must select one of the other two remaining options.
2. They **do not** have an option of using their contractor to do a “clean up check” as indicated on page 10 of the pamphlet. A clearance test will be required by a licensed professional who was not involved in the lead hazard reduction.
3. They **do not** have the option to “opt-out” as stated in “Future Sample Pre-Renovation Form” at the back of the pamphlet.

For rehabilitation purposes, the Renovate Right pamphlet replaces the [Protect Your Family from Lead in Your Home](#) pamphlet, which is now to be used just for lead disclosure at time of sale or lease, and not before renovation. Minnesota Housing funding recipients may elect to provide this pamphlet in addition to the Renovate Right pamphlet, if desired.

Minnesota Housing will be updating all relevant forms on its website to refer to the new Renovate Right pamphlet by Friday, April 2.

## Questions?

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